BASF
BASF CORPORATION

Public Meeting on New MACT Standards for the Amines Waste Fuel Boiler, Utility Boilers #3 and #6

When: ***Monday, October 2, 2006 at 6:30 p.m.***

Where: **Dutchtown High School (Cafeteria)**
13165 Highway 73, Geismar, Louisiana

BASF is holding a public meeting with the purpose of giving the community an opportunity to comment on its Notice of Intent to Comply (NIC) with the new Hazardous Waste Combustors (HWC) Maximum Achievable Control Technology (MACT) requirements of the U.S. Environmental Protection Agency. This standard applies to the Amines and Utility hazardous waste burning boilers located within the BASF Plant (8404 River Road, Geismar, Louisiana). These boilers receive liquid hazardous waste and vent gas.

For more information or to receive a copy of the NIC call Dr. R. Mark Conger, EHS Team Member, at (225) 339-7941, or write to P.O. Box 457, Geismar, Louisiana, 70734-0457. Please contact the facility at least 72 hours before the meeting if you need special access to participate in the meeting.

NOTIFICATION OF INTENT TO COMPLY
BASF Corporation
Amines Boiler
Utilities No. 3 Boiler (B-3)
Utilities No. 6 Boiler (B-6)
(DRAFT)

40 CFR 63.1210

(b) Notification of Intent to Comply

(1) You must prepare a Notification of Intent to Comply that includes the following information:

(i) General Information:

(A) The name and address of the owner/operator and the source;

RESPONSE

BASF Corporation is the owner and operator of the Geismar, Louisiana facility.

Physical Address:	**Mailing Address:**
BASF Corporation	**BASF Corporation**
8404 River Road	**P.O. Box 457**
Geismar, Louisiana	**Geismar, Louisiana**
70734-0457	**70734-0457**

(B) Whether the source is a major or an area source;

RESPONSE

BASF is a major source.

(C) Waste minimization and emission control technique(s) you are considering;

RESPONSE

Waste Minimization Techniques Being Considered:

BASF currently utilizes waste minimization techniques throughout the Geismar site to reduce wastes generated at the

facility. The Facility has a waste minimization plan in effect as required by the Louisiana Hazardous Waste Rules. BASF works to minimize off-specification materials and optimize process efficiencies, which minimize waste generation. The Amines and Utilities boilers are existing boilers. In regards to the waste streams utilized as fuel sources in the Amines and Utilities boilers, there are no additional waste minimization techniques deemed practicable at this time.

Emission Control Techniques Being Considered:

Based on preliminary evaluations of previous stack testing results and waste feed analyses, BASF currently believes that no additional control techniques will be necessary to demonstrate compliance with the HWC MACT emission standards for the existing Amines Boiler, Boiler B-3, or Boiler B-6. BASF Corporation intends to comply with the HWC MACT emission standards for the Amines Boiler, Utilities Boiler B-3, and Utilities Boiler B-6 through management of metals and chlorides in the liquid feed streams, operational controls on the boilers, and utilization of continuous monitoring systems.

(D) Emission monitoring technique(s) you are considering;

RESPONSE

BASF currently demonstrates compliance with the RCRA interim status requirements for hazardous waste combustion in boilers. As such, each affected boiler is already equipped with continuous emissions monitoring systems (CEMS) for carbon monoxide (CO) and oxygen (O_2) in the flue gas. Additional continuous monitoring systems (CMS) already exist for each boiler, including waste feed flow, atomizing pressure, combustion zone temperature, steam production, and/or stack gas flow measurements. BASF is evaluating the CMS and will make upgrades as necessary.

(E) Waste minimization and emission control technique(s) effectiveness;

RESPONSE

Previous testing and waste analyses indicate that all three boilers should comply with the HWC MACT emission standards using existing air pollution control techniques. Each

boiler is equipped with a carbon monoxide (CO) analyzer and compliance with the 100 ppmv standard is continuously demonstrated. BASF conducted trial burns for each boiler in 1997, during which, a destruction removal efficiency (DRE) ≥ 99.99% was demonstrated for a principal organic hazardous constituent (POHC). During the trial burns, particulate matter emissions and hydrogen chloride and chlorine emissions were well below the HWC MACT limits of 80 mg/dscm and 31 ppmv, respectively. Additionally, waste feed analyses indicate BASF will be able to comply with the SVM, LVM, and mercury emission standards by employing the maximum theoretical emission concentration (MTEC) approach.

(F) A description of the evaluation criteria used or to be used to select waste minimization and/or emission control technique(s); and

RESPONSE

Not applicable.

(G) A general description of how you intend to comply with the emission standards of this subpart.

RESPONSE

BASF Corporation intends to comply with the HWC MACT emission standards for the Amines Boiler, Utilities Boiler B-3, and Utilities Boiler B-6 through management of metals and chlorides in the liquid feed streams, operational controls on the boilers, and utilization of continuous monitoring systems.

(ii) As applicable to each source, information on key activities and estimated dates for these activities that will bring the source into compliance with emission control requirements of this subpart. You must include all of the following key activities and dates in your NIC:

(A) The dates by which you anticipate you will develop engineering designs for emission control systems or process changes for emissions;

RESPONSE

Based on preliminary evaluations of previous stack testing results and waste feed analyses, BASF currently believes that no additional control emission control systems or process changes will be necessary to demonstrate compliance with the HWC MACT emission standards for the existing Amines Boiler, Boiler B-3, or Boiler B-6.

(B) The date by which you anticipate you will commit internal or external resources for installing emission control systems or making process changes for emission control, or the date by which you will issue orders for the purchase of component parts to accomplish emission control or process changes;

RESPONSE

Not applicable.

(C) The date by which you anticipate you will submit construction applications;

RESPONSE

Not applicable.

(D) The date by which you anticipate you will initiate on-site construction, installation of emission control equipment, or process change;

RESPONSE

Not applicable.

(E) The date by which you anticipate you will complete on-site construction, installation of emission control equipment, or process change; and

RESPONSE

Not applicable.

(F) The date by which you anticipate you will achieve final compliance. The individual dates and milestones listed in paragraphs (b)(1)(ii)(A) through (F) of this section as part of the NIC are not requirements and therefore are not enforceable

deadlines; the requirements of paragraphs (b)(1)(ii)(A) through (F) of this section must be included as part of the NIC only to inform the public of your intention to comply with the emission standards of this subpart.

RESPONSE

Final compliance will be achieved as called for in 40 CFR 63.1206(a)(2)(i) which currently is established as October 14, 2008.

(iii.) A summary of the public meeting required under paragraph (c) of this section.

RESPONSE

The public meeting is scheduled for October 2, 2006 from 6:30 pm to 8:30 pm. The meeting will be held at Dutchtown High School, which is located at 13165 Highway 73 in Geismar, Louisiana.